

5

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

UNITED STATES OF AMERICA,

v.

D-1 KILAUN M. BROOKS,
D-2 DEMOND A. MANLEY, JR., and
D-3 CHRISTOPHER J. RUDOLPH,

Defendants.

Violations:
18 U.S.C. § 1951
18 U.S.C. § 2

Case: 1:25-cr-20050
Judge: Ludington, Thomas L.
MJ: Morris, Patricia T.
Filed: 02-05-2025
SEALED MATTER (tt)

INDICTMENT

The Grand Jury charges:

COUNT ONE

18 U.S.C. §§ 1951(a) and 2

Interference with Commerce by Robbery

D-1 KILAUN M. BROOKS

On or about December 12, 2024, in the Eastern District of Michigan, the defendant, KILAUN M. BROOKS, and others known and unknown to the grand jury, aiding and abetting one another, unlawfully obstructed, delayed, and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that KILAUN M. BROOKS, and others known and unknown to the grand jury, unlawfully took property, specifically jewelry, from the presence of employees of Zales the Diamond Store Outlet in Birch Run, Michigan, against their will, by means

of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property in their custody and possession; all in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT TWO

18 U.S.C. §§ 1951(a) and 2

Interference with Commerce by Robbery

D-1 KILAUN M. BROOKS

D-2 DEMOND A. MANLEY, JR.

D-3 CHRISTOPHER J. RUDOLPH

On or about May 10, 2024, in the Eastern District of Michigan, the defendants, KILAUN M. BROOKS, DEMOND A. MANLEY, JR., CHRISTOPHER J. RUDOLPH, and others known and unknown to the grand jury, aiding and abetting one another, unlawfully obstructed, delayed, and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that KILAUN M. BROOKS, DEMOND A. MANLEY, JR., CHRISTOPHER J. RUDOLPH, and others known and unknown to the grand jury, unlawfully took property, specifically jewelry, from the presence of employees of Kay Jewelers in Fenton, Michigan, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property in their custody and possession; all in violation of Title 18, United States Code, Sections 1951(a) and 2.

FORFEITURE ALLEGATIONS

(18 U.S.C. § 981 and 28 U.S.C. § 2461)

1. The allegations contained in Counts One and Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) together with Title 28, United States Code, Section 2461.

2. Upon conviction of the offense(s) charged in Counts One and Two of this Indictment, in violation of Title 18, United States Code, Sections 1951 and Two, defendant(s) shall forfeit to the United States any property which constitutes or is derived from proceeds traceable to the offense(s), pursuant to Title 18, United States Code, Section 981(a)(1)(C) together with Title 28, United States Code, Section 2461.

3. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of defendant:

- (a) Cannot be located upon the exercise of due diligence;
- (b) Has been transferred or sold to, or deposited with, a third party;
- (c) Has been placed beyond the jurisdiction of the Court;
- (d) Has been substantially diminished in value; or
- (e) Has been commingled with other property that cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) as incorporated by Title 28, United States Code, Section 2461, to seek to forfeit any other property of defendant up to the value of the forfeitable property described above.

THIS IS A TRUE BILL.

s/GRAND JURY FOREPERSON

JULIE A. BECK
Acting United States Attorney

s/ANTHONY P. VANCE
Anthony P. Vance
Assistant United States Attorney
Chief, Branch Offices

s/CHRISTOPHER W. RAWSTHORNE
Christopher W. Rawsthorne
Assistant United States Attorney
600 Church Street, Suite 210
Flint, MI 48502
Telephone number: (810) 766-5177
Christopher.rawsthorne@usdoj.gov

Dated: February 5, 2025

Companion Case information MUST be completed by AUSAUnited States District Court
Eastern District of Michigan**Criminal Case Cover**Case: 1:25-cr-20050
Judge: Ludington, Thomas L.
MJ: Morris, Patricia T.
Filed: 02-05-2025
SEALED MATTER (tt)

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials:

Case Title: USA v. KILAUN M. BROOKS, ET. AL.County where offense occurred : SAGINAWCheck One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/___ Information --- no prior complaint.
 ___ Indictment/___ Information --- based upon prior complaint [Case number: _____]
 ___ Indictment/___ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____


- ☐ Original case was terminated; no additional charges or defendants.
☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

February 5, 2025

Date


 Christopher W. Rawsthorne
 Assistant United States Attorney
 210 Federal Building
 600 Church Street
 Flint, Michigan 48502
 Telephone: (810) 766-5177
 Email: Christopher.Rawsthorne@usdoj.gov
 P84401

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.